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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 BOBBIE LOWE )  
13 v. Plaintiff, ) Case No. 2:17-cv-02619-GMN-VCF  
14 NANCY A. BERRYHILL, )  
15 Acting Commissioner of Social Security, )  
16 Defendant. ) **DEFENDANT'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME (FIRST REQUEST)**

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1                   Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)  
2 respectfully requests a 30-day extension of time, from December 18, 2017 to January 17, 2018 for  
3 Defendant to answer the complaint and submit the certified administrative record (CAR) in the above-  
4 captioned case.

5                   This is Defendant’s first request for an extension of time. Defendant respectfully submits that  
6 the requested extension is necessary to allow the Commissioner to prepare the CAR for submission to  
7 this Court and parties in this action. It has taken longer than anticipated to prepare the CAR despite  
8 the Commissioner’s diligent efforts to have it ready in time. This request is made in good faith with  
9 no intention to unduly delay the proceedings.

10                  Counsel for Defendant conferred via email with Plaintiff’s counsel, who indicated on  
11 December 14, 2017 that Plaintiff does not oppose this motion or the requested extension.

12                  Respectfully submitted,

13                  Dated: December 14, 2017

14                  STEVEN W. MYHRE  
15                  Acting United States Attorney

16                  By: /s/ Margaret Branick-Abilla  
17                  MARGARET BRANICK-ABILLA  
18                  Special Assistant United States Attorney  
19                  Attorneys for Defendant

20                  OF COUNSEL TO DEFENDANT:

21                  DEBORAH LEE STACHEL  
22                  Regional Chief Counsel, Region IX

23                  IT IS SO ORDERED:

24                    
25                  HON. CAM FERENBACH  
26                  UNITED STATES MAGISTRATE JUDGE

27                  12-15-2017  
28                  DATED: \_\_\_\_\_

## **CERTIFICATE OF SERVICE**

I, Margaret Branick-Abilla, certify that the following individual(s) was served with a copy of the **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the date and via the method of service identified below:

## CM/ECF:

Hannalore Burns Merritt  
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Attorney for Plaintiff

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Attorney for Plaintiff

Date: December 14, 2017

/s/ Margaret Branick-Abilla  
MARGARET BRANICK-ABILLA  
Special Assistant United States Attorney